The Honorable Ronald B. Leighton 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 SOLOWHEEL, INC., Plaintiff, Case No. 3:16-cv-05688-RBL 10 11 STIPULATION AND ORDER TO v. **EXTEND DEADLINES** NINEBOT INC. (USA), D/B/A NINEBOT 12 U.S., INC.; NINEBOT (TIANJIN) TECHNOLOGY CO., LTD.; NINEBOT, INC. 13 (China), 14 Defendant. 15 16 17 Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Solowheel, Inc. ("Solowheel") 18 19 and Defendant Ninebot (Tianjin) Technology Co., Ltd ("Ninebot") hereby stipulate and jointly 20 move the Court for extensions regarding all remaining deadlines set forth in the Court's June 28, 21 2018 Order Granting Stipulation and Joint Motion to Extend Deadlines (D.I. 41). The reason for this Stipulation and Order to Extend Deadlines is that (i) the parties are involved in extensive 22 23 discussions toward settlement of all pending issues, and believe the additional time requested 24 shall facilitate such resolution, and (ii) the parties desire to ensure consistency and coherence

between the dates established in the foregoing orders, to ensure timely completion of all stages of

STIPULATION AND
ORDER TO EXTEND DEADLINES - 1
Case No. 3:16-cv-05688-RBL

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the case. The proposed extension of deadlines follows the Court's Local and Patent Rules and is as follows:

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STIPULATION AND ORDER TO EXTEND DEADLINES - 2 Case No. 3:16-cv-05688-RBL

**Original Date Proposed Date** Joint Claim Construction August 27, 2018 September 27, 2018 Claim Construction Expert Disclosures August 27, 2018 September 27, 2018 September 27, Completion of Claim Construction Discovery October 29, 2018 2018 Opening Claim Construction Brief October 1, 2018 November 1, 2018 Responsive Claim Construction Brief October 16, 2018 November 16, 2018 Markman hearing at 09:00 AM To be determined. To be determined. Expert Witness Disclosure/Reports under To be determined. To be determined. FRCP 26(a)(2) Rebuttal Expert Disclosure/Reports To be determined. To be determined. Motions To be determined. To be determined. Completion of discovery (fact and expert) To be determined. To be determined. Dispositive motions To be determined. To be determined. Attorney settlement conference To be determined. To be determined. Mediation to be completed To be determined. To be determined. Motions in Limine To be determined. To be determined. Pretrial Order To be determined. To be determined. Trial briefs To be determined. To be determined. Voire dire/jury instructions To be determined. To be determined.

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1	The Parties acknowledge the proposed extension of deadlines may impact later dates, and	
2	will adhere to any subsequent resetting of deadlines which the Court deems appropriate. A	
3	Proposed Order is below.	
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5	Dated: August 23, 2018	
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7	Respectfully submitted,	
8	By: s/ Benjamin J. Hodges	By: <u>s/ Al Van Kampen</u> Al Van Kampen
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10	FOSTER PEPPER PLLC 1111 3rd Avenue, Suite 3000 Seattle,	Seattle, WA 98154
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13	E-mail: Ben.Hodges@foster.com, Kevin.Ormiston@foster.com	Cameron H Tousi (admitted <i>pro hac vice</i> ) IP LAW LEADERS PLLC
14		6701 Democracy Blvd, Ste 555 Bethesda, MD 20817
15	Counsel for Plaintiff Solowheel, Inc.	Telephone: (202) 248-5410 Email: chtousi@ipllfirm.com
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17		Counsel for Defendant Ninebot (Tianjin) Technology Co., Ltd.
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19	ORDER	
20	Based on the foregoing stipulation of the parties, IT IS SO ORDERED	
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22	DATED this 24 <sup>th</sup> day of August, 2018.	
23		DAR CIL
24		Ronald B. Leighton
25		United States District Judge
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